

STEVE WILDMAN AND JON)
BORCHERDING, INDIVIDUALLY AND)
AS REPRESENTATIVES OF A CLASS)
OF SIMILARLY SITUATED PERSONS,)
AND ON BEHALF OF THE AMERICAN)
CENTURY RETIREMENT PLAN,)
)
Plaintiffs,) CASE NO. 16-CV-737
v.)
)
AMERICAN CENTURY SERVICES, LLC,)
THE AMERICAN CENTURY)
RETIREMENT PLAN RETIREMENT)
COMMITTEE, AMERICAN CENTURY)
INVESTMENT MANAGEMENT, INC.,)
AMERICAN CENTURY COMPANIES,)
INC., CHRISTOPHER BOUFFARD,)
BRADLEY C. CLOVERDYKE,)
JOHN A. LEIS, TINA S. USSERY-)
FRANKLIN, MARGARET E. VAN)
WAGONER, GUDRUN S. NEUMANN,)
JULIE A. SMITH, MARGIE A.)
MORRISON, AND JOHN DOES 1-20,)
)
Defendants.)

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Defendants American Century Services, LLC, the American Century Retirement Plan Retirement Committee, American Century Investment Management, Inc., American Century Companies, Inc., Christopher Bouffard, Bradley C. Cloverdyke, John A. Leis, Tina S. Ussery-Franklin, Margaret E. Van Wagoner, Gudrun S. Neumann, Julie A. Smith, and Margie A. Morrison (“Defendants”) respectfully move this Court for an Order (i) dismissing Plaintiffs’ Complaint in its entirety pursuant to Federal Rule of Civil Procedure 56 on the grounds that Plaintiffs have released claims against Defendants under ERISA, and covenanted to not sue Defendants regarding the same, and (ii) granting such other and further relief as the Court deems just and proper. The grounds for this motion are more fully set forth in the accompanying Suggestions in Support of Defendants’ Motion for Summary Judgment as to Plaintiffs’ Releases and Covenants Not to Sue.

Dated: August 18, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 18th day of August, 2016, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following counsel of record:

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